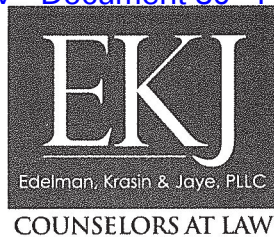


PAUL B. EDELMAN +
LAWRENCE P. KRASIN
WILLIAM T. JAYE
SAL A. SPANO



KARA M. ROSEN ++
MONICA P. BECKER
AARON D. FINE
VICTOR I. BOTA ++
DANIEL J. SOLINSKY
HAROLD J. STANGLER
1929-2017

+ADMITTED IN NY & DC
++ADMITTED IN NY & NJ

March 22, 2022

VIA ECF

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

USDC SDNY
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DOC #:
DATE FILED: 3/24/2022

Re: *Aichatou Conde v. Avila Transportation LLC, and Edison
Patricio Fajardo Pulla*
Civil Action No.: 1:21-cv-03685-MKV

Dear Judge Vyskocil:

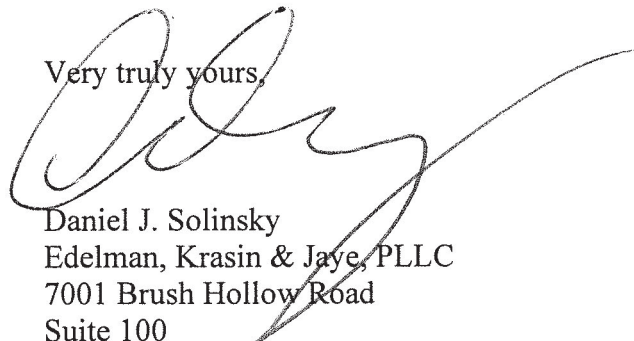
The undersigned represents the plaintiff in the above referenced matter. I write this letter with the consent and review of all parties. Please accept this correspondence as a joint letter motion required by Your Honor's Individual Rules.

As discussed in recently filed letters, the parties are pleased to report that, with the assistance of Magistrate Judge Ona T. Wang, we very near a settlement in this matter. The item that is holding up a final resolution is getting in touch with Social Services to determine the amount of their lien on the plaintiff's recovery. The parties anticipate a response from Social Services to be forthcoming but cannot settle until this is determined with certainty.

In light of the anticipated settlement, and in an exercise of caution the parties respectfully request that the deadline for depositions and fact discovery be extended from March 19th, 2022 to May 19, 2022 and that Expert Discovery be extended from May 21, 2022 to July 21, 2022. This is the first request for an extension. It is the sincere belief of the parties that further discovery will not be necessary once the requisite information is obtained from Social Services however, the parties request the extension out of an abundance of caution.

The parties jointly thank the Court for its patience with this matter and we look forward to resolving this matter as soon as possible and to the conference scheduled for April 1. The parties note that the April 1st conference, was originally scheduled for an in person conference on January 20th and unless instructed otherwise the parties will appear in person on the April 1st.


Very truly yours,



Daniel J. Solinsky
Edelman, Krasin & Jaye, PLLC
7001 Brush Hollow Road
Suite 100
Westbury, New York 11590

In the light of the representations in the letters filed on March 23, 2022 [ECF Nos. 26, 27, 28, 29], IT IS HEREBY ORDERED that: (1) the deadline to complete fact discovery is April 19, 2022, and the deadline to complete expert discovery is June 19, 2022; (2) the conference that was previously scheduled to take place on April 1, 2022 is ADJOURNED to May 26, 2022 at 11:30 a.m.; and (3) no sanctions are necessary or appropriate at this time. IT IS FURTHER ORDERED that the parties shall submit a joint letter in 3 weeks, informing the Court whether they have reached a settlement, as well as a joint status letter one week before the May 26, 2022 conference. **Failure to comply with the Court's orders and Individual Rules may result in sanctions, including monetary sanctions, preclusion of evidence, and dismissal of claims, defenses, and this case.**

Date: March 24, 2022
New York, New York



Mary Kay Vyskocil
United States District Judge